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Counsel for Plaintiffs

(additional attorneys listed below)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

HENRY'S BULLFROG BEES, a California
apiary; SAVE GOLDEN PRAIRIE HONEY
FARMS, LLC, a Kansas not for profit
corporation; and KELVIN ADEE d/b/a
ADEE HONEY FARMS, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

SUNLAND TRADING, INC.; LAMEX
FOODS, INC.; BARKMAN HONEY, LLC;
DUTCH GOLD HONEY, INC.; TRUE
SOURCE HONEY, LLC; INTERTEK
TESTING SERVICES, NA, INC.; and NSF
INTERNATIONAL,

Defendants.

Case No.: 21-CV-00582-TLN-CKD

**NOTICE OF MOTION TO COMPEL
DEFENDANTS' COMPLIANCE WITH
FED. R. CIV. P. 26(f)**

Date: March 2, 2022
Time: 10:00 a.m.
Court: 24, 8th Floor
Judge: Hon. Carolyn K. Delaney

NOTICE OF MOTION

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD: PLEASE
TAKE NOTICE THAT, on March 2, 2022, at 10:00 a.m., or as soon thereafter as may be
heard, Plaintiffs will and hereby do move the Court, the Honorable Carolyn Delaney
presiding, to order Defendants' compliance with Fed. R. Civ. P. 26(f). The Motion is based
on this Notice of Motion, the concurrently filed Joint Statement of Discovery Disagreement,
all pleadings and proceedings had in the action, and all further argument and evidence
presented in support of the Motion.

Plaintiffs seek an order compelling Defendants' compliance with Fed. R. Civ. P. 26(f).

Dated: February 18, 2022

By: /s/ Melanie Persinger
Melanie Persinger

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